

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

In Re:)	
)	
LALONNIE MARIE (GROVES))	Bankruptcy No. 07-60283-abf7
)	
Debtor.)	
)	
LALONNIE MARIE,)	
)	
Plaintiff,)	
)	
vs.)	
)	Adv. Proc. No. 07-06032-abf7
SALLIE MAE, INC., CITIBANK NA,)	
EDUCAIDEXTRA PREM LN, ECMC,)	
MOHELA, and LMV FUNDING,)	
EDUCATIONAL CREDIT MANAGEMENT)	
CORP. and CAMPUS PARTNERS,)	
)	
Defendants.)	

**DEFENDANT, MOHELA'S RESPONSE TO THE
PLAINTIFF'S SECOND AMENDED COMPLAINT**

COMES NOW, MOHELA, by and through its attorneys, and hereby files its responsive pleading in this matter to the Second Amended Complaint by the Debtor filed August 30, 2007, and MOHELA does hereby assert that it denies each and every paragraph, sentence and allegation set forth in the second amended complaint by the Debtor.

1. MOHELA further asserts as an affirmative defense that the second amended complaint fails to state a claim for which relief can be granted.

2. Further answering and by way of affirmative defense MOHELA states that the debt in question is one for an educational benefit granted by a governmental unit and was done with respect to Plaintiff's undergraduate degree and that it does not constitute an undue hardship for the Debtor or the Debtor's dependents. No hardship was found in that Debtor has a college degree and has the ability to earn a living and pay for her normal expenses and repay her student loans over time.

WHEREFORE, Defendant, MOHELA asks that the Court after, after reviewing the responsive pleading find that Plaintiff is not entitled to the relief set forth in her complaint to dismiss or deny said complaint and for such other and further relief as the Court deems just in the premises.

LOWTHER JOHNSON, LLC

By: /s/ Lee J. Viorel

Lee J. Viorel
Missouri Bar Number 36886
901 St. Louis Street, 20th Floor
Springfield, MO 65806
Office: (417) 866-7777
Fax No: (417) 866-1752
lviorel@lowtherjohnson.com

Attorneys for Creditor, MOHELA

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served by electronic notice or by United States Mail, First Class postage prepaid, this 11th day of October, 2007, to:

Lalonne Marie
346 S. Yellowwood Dr.
Springfield, MO 65809-3313

Michael H. Berman
Berman & Rabin, PA
10660 Barkley
Overland Park, KS 66212

Citibank, NA
701 East 60th Street N.
Sioux Falls, SD 57104-0432

N. Larry Bork
Goodell, Stratton, Edmonds, & Palmer, LLP
515 S. Kansas Avenue
Topeka, KS 66603

Educaidextra Prem. Ln
1200 N. 7th Street
Harrisburg, PA 17102-1419

LMV Funding, LLC
PO Box 10497
Greenville, SC 29603-0584

Campus Partners
PO Box 970004
Boston, MA 02297-0004

/s/ Lee J. Viorel
Lee J. Viorel